

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF IOWA

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	CRIMINAL NO. 4:13-CR-55
)	
v.)	
)	
MICHAEL FRANCIS STEIN)	GOVERNMENT'S RULE 12.4
)	STATEMENT
)	
Defendants.)	

The United States of America, by and through its undersigned counsel,
respectfully submits the following disclosure statement as required by Fed. R. Crim. P. 12.4.

1. The following corporation is the victim of the criminal activity charged in the above case:

Wellmark is an Iowa corporation with its principal place of business located in Des Moines, Iowa. Wellmark does business under the name Wellmark Blue Cross and Blue Shield of Iowa. Wellmark is a mutual insurance company that is licensed by the Iowa Division of Insurance to provide health care benefits to its members. Wellmark is an independent licensee of the Blue Cross and Blue Shield Association (BCBSA). The BCBSA is a national federation of 38 Blue Cross and Blue Shield companies. Wellmark has no parent corporation and no publicly held corporation owns 10% or more of their stock.

2. This statement is based on information reasonably believed to be accurate and presently available to government counsel, upon the exercise of due diligence, and is subject to

being supplemented under Fed. R. Crim. P. 12.4(b)(2).

Respectfully Submitted,

Nicholas A. Klinefeldt
United States Attorney

By: /s/ John S. Courter
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CERTIFICATE OF SERVICE

I hereby certify that on July 2, 2013, I electronically filed the foregoing with the Clerk of Court using the ECF system which will send notification of such filing to the attorney(s) of record.

UNITED STATES ATTORNEY

By: /s/ AUSA John S. Courter